

## Module 2: Environmental Policy

Guidance .....	2-2
Tools .....	2-4
Tool 2-1: Environmental Policy Worksheet .....	2-4
Examples.....	2-5
Example 2-1: Generalized Environmental Policy Template.....	2-5



## *GUIDANCE*

Once your organization has its EMS Team (the EMR, EMS Coordinator, and CFT) trained and in place, the next step is to create a working draft of your organization's environmental policy. As your EMS Team moves forward, the policy should serve as the foundation for your EMS and provide a unifying vision of environmental principles that will guide the actions of employees and management. This policy statement should provide the framework for setting environmental objectives and targets.

The EMS policy should set out the facility's overall commitment to a cleaner environment. Example commitments that should be stated in your EMS policy are those presented by EPA's Performance Track program:

- Compliance with legal requirements and any voluntary commitments;
- Pollution prevention;
- Continuous improvement in environmental performance, including areas not subject to regulations; and
- Sharing information about environmental performance and the operation of your EMS with the community.

### **Points to Consider in Developing Your Policy:**

- Your organization probably has some type of environmental policy now, **even if it's not written down**. For example, your organization probably is committed to complying with the law and avoiding major environmental problems, at a minimum. Document existing commitments and goals as a starting point.
- The environmental policy should relate to your activities, products and services.
- The environmental policy can be a stand-alone document or it can be **integrated** with your health & safety, quality, or other organizational policies.
- The environmental policy should be **explicit enough to be audited**. If you choose to use phrases such as "We are committed to excellence and leadership in protecting the environment", consider how you would demonstrate that this commitment is being met.
- Keep your policy **simple and understandable**. Ask yourself: what are we trying to achieve and how can we best communicate this to the rest of the organization? Test simplicity and clarity by asking: "Could our employees describe the intent of our policy in twenty words or less?"

### Points to Consider in Developing Your Policy: (cont.)

- Before finalizing your environmental policy, consider the results of establishing your facility's **objectives and targets** (*see Module 5*) so that it reflects consistency with those.
- Make sure **top management** commits to the environmental policy statement. The company president should sign and date it. The final environmental policy statement should be posted or distributed to employees and other interested parties.
- Make sure that your **employees** receive and understand the policy. Options for communicating your policy internally include posting it around work sites (e.g., in lunchrooms), using paycheck stuffers, incorporating the policy into training classes and materials, and referring to the policy at staff or all-hands meetings. **Test awareness** and understanding from time to time by asking employees if they know there is an environmental policy, what the policy means to them, and how it affects their work.
- The policy also should be communicated **externally**. Some options for external communications include placing the policy on business cards, in newspaper advertisements, in annual reports, and on a company web-site (if you have one). You might choose to communicate the policy proactively or in response to external requests (or both). This decision should be factored into your overall strategy for external communication (see later discussion in *Module 9*).

**Tool 2-1** is a worksheet of questions for you to consider in developing your EMS policy. A sample policy that could be customized to fit your needs is provided as **Example 2-1**.



## TOOLS

### Tool 2-1: Environmental Policy Worksheet

<p>Do we have an <b>existing environmental policy</b>?</p> <p>If yes, how was the policy developed?</p> <p>When was the policy last reviewed?</p>	
<p>Does the policy reflect key commitments (for example, compliance, prevention of pollution and continual improvement)?</p> <p>What other commitments does or should our policy contain?</p>	
<p>How does our policy take into account the environmental attributes of our activities, products, and services?</p>	
<p>How would we demonstrate conformance to our policy?</p>	
<p>How is the policy communicated to our employees?</p> <p>Do our employees understand the critical elements of our policy? How do we know?</p>	
<p>What feedback have we received on the policy (from employees, contractors, or other interested parties)?</p> <p>What happens when we receive feedback on the policy?</p>	
<p>How do we make our policy available to external parties? Is this process effective?</p>	
<p><i>Our next step on environmental policy is to ...</i></p>	



## **EXAMPLES**

### **Example 2-1: Generalized Environmental Policy Template**

**[YOUR FACILITY'S NAME]  
ENVIRONMENTAL POLICY**

**[This is a sample policy. Please adapt as appropriate for your company.]**

[Your Facility's Name] is committed to managing environmental matters as an integral part of our business planning and decisions, including design, procurement, production, facilities management, and product support. Manufacturing efficiency, and environmental protection are, and must continue to be, compatible goals. To obtain these goals, we will adhere to the following principles:

**Compliance with legal requirements and voluntary commitments**

[Your Facility's Name] shall comply with applicable laws, regulations, and voluntary commitments, and will implement programs and procedures that ensure this compliance. Sustained compliance with legal and company environmental standards will be a key consideration in facility training and incentive programs, and in periodic performance reviews of all employees.

[Your Facility's Name] shall promote a workplace in which all employees are properly trained to comply with applicable laws, regulations, and procedures, to meet environmental program goals, and to take personal responsibility for implementation of the program.

**Pollution Prevention**

[Your Facility's Name] shall strive to be a leader in improving environmental quality, by minimizing waste and emissions, reusing and recycling, reducing the use of natural resources, and promoting pollution prevention efforts throughout the facility.

[Your Facility's Name] shall employ management systems and procedures specifically designed to prevent activities and / or conditions that pose a threat to human health, safety, or the environment. We will look for ways to minimize risk and protect our employees and the communities in which we operate by adopting pollution prevention practices including employing clean technology and operating procedures, as well as being prepared for emergencies.

[Your Facility's Name] shall strive to minimize releases to the air, land, or water through use of cleaner technologies and the safer use of chemicals. We shall minimize the amount and toxicity of waste generated and shall ensure the safe treatment and disposal of waste.

[Your Facility's Name] shall manage natural resources, such as water, energy, land, habitats, and scenic values, in an environmentally sensitive manner.

**Sharing Information with the Community**

[Your Facility's Name] shall share information on our commitment to environmental performance improvement to our employees, vendors, customers, and external stakeholders. We will solicit their input in meeting our environmental goals and in turn will offer assistance to meet their goals.

**Continual Improvement**

We shall measure our progress as best we can. We will review and report on our progress at least on an annual basis. We will continuously seek opportunities to improve our adherence to these principles and to improving our environmental performance, and we will periodically report progress to our stakeholders.

Management at all levels of [Your Facility's Name] is responsible for ensuring that this policy is communicated and adhered to by all employees and subcontractors, and that it is made available to interested members of the public.

\_\_\_\_\_{Signature}\_\_\_\_ President

\_\_\_\_ Date